



7. The Parties' requested amendments to the Scheduling Order impact only future deadlines that have not yet passed. *See* Fed. R. Civ. P. 6(b) (1)(A) ("the court may, for good cause, extend the time: with or without motion . . . or if a request is made, before the original time or its extension expires[.]").

8. The Parties propose the following amendment to the discovery plan and scheduling deadlines:

<b>Discovery Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Defendant's Expert Designation	11/30/20	12/30/20
Rebuttal Expert Designations	12/17/20	1/18/21
Discovery Dispute Motions	12/17/20	1/18/21
Completion of Discovery	12/31/20	02/01/21
Dispositive Motions	02/01/21	03/03/21

9. This matter is set for trial to begin on June 28, 2021. The trial date is not affected by the Parties' requested amendments to the Scheduling Order.

10. The Parties do not anticipate any prejudice to result from the requested extension.

WHEREFORE, Defendant Walmart and Plaintiff Jeanne Graham respectfully request that this Court grant this Motion and enter an Order extending the time to conduct discovery, and for such other relief as the court deems just and proper.

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I certify that on this 20th day of November 2020, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court, which will send notification to all counsel of record.

/s/ Gregorio Silva